REMARKS

Favorable reconsideration of this application in light of the following discussion is respectfully requested.

Claims 1-22 are presently active in this Application. Claims 1, 2, and 4 have been amended to correct a typographical error that was introduced by the last Amendment, without the introduction of any new matter.

The outstanding Office Action includes an objection to Claims 1, 16, and 18, a rejection of Claims 1-4, 6-9, 11-14, and 16-22 under 35 U.S.C. §103(a) as being unpatentable over Amano et al (U.S. Patent No. 6,100,996, Amano) in view of Hiratsuka et al. (U.S. Patent No. 5,301,271, Hiratsuka) and a rejection of Claims 5, 10, and 15 under 35 U.S.C. §103(a) as being unpatentable over Amano in view of Hiratsuka in further view of Nakajima (U.S. Patent No. 6,266,152).

Applicant acknowledges with gratitude the discussion held with Examiner Park and Supervisory Examiner Cole on October 12, 2004.

During this discussion, Applicant's representative first pointed out that the specification and claims as filed used the terminology "printer driver," not "print driver," and that the terminology "print driver" was introduced as a typographical error into Claims 1, 2, and 4 by the Amendment filed June 24, 2004. Accordingly, it was further pointed out that the objection to Claims 1, 16, and 18 for using the terminology of a "printer driver" instead of a "print driver" was misplaced as it was the new language of a "print driver" that should be corrected to the originally used language of a "printer driver."

This being the case, the present amendment corrects the improper amended language "print driver" added to Claims 1, 2, and 4 to read as --printer driver-- to be consistent with the original language of the specification and claims and with the

antecedent recital of "A printer driver" at line 6 of Claim 1. Moreover, as the use of an upper case "A" here was also a clear typographical error, it has been amended to be a lower case "a." Therefore, withdrawal of the outstanding objection as to Claims 1, 16, and 18 is respectfully urged to be in order.

In addition to addressing the objection to Claims 1, 16, and 18, Applicant's representative pointed out that Amano was the basic reference relied upon to reject each of Claims 1-22 in the outstanding Office action but that the interpretation in this Action of what this reference fairly taught was clearly flawed.

In this last regard, Applicant's representative first noted that the statement of the first full paragraph on page 4 of the outstanding Action that "[i]t is evident that the draw command is separate from the print data since the command is not printed with the graphic" was not logical because it confused the draw command signal parameter and the graphic that this draw command signal parameter defined. Thus, it was noted that the print data cannot be equated to the image actually printed as this print data is merely a parameter that is processed to produce a printed image, whether that printed image is a graphic one or simply a character, such as an alphabetic letter.

Note for example, that the "parameters" taught by Amano at col. 14, lines 30-34 include "character code" as well as the "drawing command" parameter. It cannot be reasonably said that this "character code" is separate from itself simply because the character image it causes to be printed does not contain any of the character code parameter. Similarly, just because the graphic printed does not include any of the associated drawing command parameter that is needed to control its formation, it cannot be said that this drawing command parameter is separate from itself.

The Examiners acknowledged that the claims all required that information separate from the converted drawing data must be added to the print data to identify

each type of drawing object and that the above-noted "draw command" of Amano is not reasonably interpreted to be separate from the converted print data or in any way added to the converted print data simply because the "draw command" of Amano is not printed with the graphic it defines.

Furthermore, it is noted that Claim 1 recites a printer system which inputs drawing data defining a drawing object created or edited by an application on a host computer. The outstanding Action suggests this system corresponds to printer 1000 of Fig. 1 of Amano. Claim 1 requires this system then "converts the drawing data defining a drawing object" that was "created or edited on a host computer" into "a printer language to create print data." The outstanding Action suggests that the teachings of col. 11, line 64-col. 12, line 4 of Amano teach the creation of documents with drawing objects using host computer 3000 while pointing to col. 15, lines 16-19 as teaching converting the drawing data defining a drawing object into a printer language to create print data. However, the teaching here is that the host computer 3000 must do the conversion unlike the requirement of Claim 1 for the printer system to do the conversion.

Also, it is noted that the teaching of col. 14, lines 41- 45, of Amano as to identification information being "maintained separately," cannot be reasonably said to teach the adding of such identification information to the converted print data.

In this last respect, the rationale at page 4, lines 5-7, of the outstanding Action is not understood because the claims require the printer driver to "add information separate from the converted drawing data to the print data to identify each type of drawing object" and not to maintain this information separately after an analysis of the converted print data as in Amano.

The suggestion of page 4, lines 7- 10, of the outstanding Action is also not understood. The Fig. 5 flow chart steps clearly involve processing controlled by control program 200 that resides in the printer 1000. See col. 14, lines 27-29. The print data already converted by host computer 3000 is received at the printer 1000 and is then analyzed as to contained parameters as explained at col. 14, lines 30-40 of Amano. It is only after this analysis of the print data from host computer 3000 that the teaching of col. 14, lines 41- 45 as to providing identification information that is "maintained separately" is performed. Therefore, this information did not exist when the print data already converted by host computer 3000 was sent to the printer 1000 and it cannot be reasonably asserted to be obvious to add data that does not exist to existing data.

Moreover, while FIG. 7 of Amano, and the discussion of steps S71 and S73 at column 15, lines 20-27 suggest that the results of such a print data analysis can be stored in memory for future use, neither this analysis of the printing parameters data, nor the separate memory storage of the results of the analysis of the printing data, can be reasonably read on the claimed adding of information to the converted print data that is separate from that converted print data.

Furthermore, the outstanding rejection of Claims 1-4, 6-9, 11-14, and 16-22 under 35 U.S.C. §103(a) is over Amano in view of Hiratsuka is traversed because Hiratsuka cures none of the deficiencies noted above as to Amano.

In this last regard, while col. 7, lines 3- 17, of Hiratsuka (relied on at page 4 of the outstanding Action) may teach that a standard "PostScript" Adobe System converted printer language can include parameter codes that indicate "fill," this is a code parameter of the converted language, not information separate from the converted drawing data that has been added to the print data to identify each type of

drawing object as the claims all require, much less the required fill information also to be added to the converted language when the drawing object is graphics data. Moreover, to whatever extent that col. 7, lines 57-68 suggest that the nature of the converted language code indicates either binary eight color data or multi-level color data, this is still an analysis of the code itself, not an addition of information separate from the converted drawing data that has been added to the print data to identify each type of drawing object as the claims all require.

Accordingly, it is respectfully submitted that even if the outstanding Action presented true evidence suggesting a combination of Amano and Hiratsuka, which is not the case, the combination still contains no hint of all the claimed subject matter such that no *prima facie* case of obviousness as to all of the subject matter of Claims 1-4, 6-9, 11-14, and 16-22 based upon Amano in view of Hiratsuka has been established. See MPEP §2143.03

The outstanding Action relies on Nakajima as well as on Amano and Hiratsuka to reject dependent Claims 5, 10, and 15. However, Nakajima cures none of the above-noted deficiencies of Amano and/or Hiratsuka and this rejection of Claims 5, 10, and 15 is, thus, traversed for the reasons noted above.

Accordingly, as no outstanding issues remain to be resolved, it is respectfully urged that the present application is in condition for formal allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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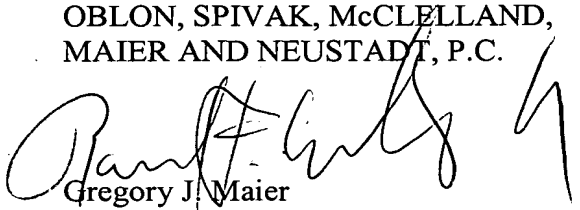

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